

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

DOUGLAS NORWOOD \*  
4607 London Bridge \*  
Sykesville, Maryland 21784 \*

Plaintiff, \*

v. \* Case No. 1:20-cv-01333

CHIPOTLE MEXICAN GRILL, INC. \*  
1401 Wynkoop \*  
Suite 500 \*  
Denver, Colorado 80202 \*

SERVE ON: \*  
CSC-Lawyers Incorporating \*  
Service Company \*  
7 St. Paul Street \*  
Suite 820 \*  
Baltimore, Maryland 21202 \*

Defendants. \*

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COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Douglas Norwood, by undersigned counsel, hereby files this Complaint against Chipotle Mexican Grill, Inc., Defendant herein, and alleges as follows:

I. JURISDICTION AND VENUE

1. Plaintiff invokes the jurisdiction of this Court pursuant 28 U.S.C. § 1332.

2. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(a).

3. The amount in controversy herein exceeds the sum of \$75,000.00, exclusive of interest and costs.

## **II. PARTIES**

4. Douglas Norwood ("Norwood") is a citizen of the State of Maryland with a residence in Carroll County at 4607 London Bridge Road, Sykesville, Maryland 21784.

5. Chipotle Mexican Grill, Inc. ("CMG") is a Colorado based Corporation with its principal place of business located at 1401 Wynkoop, Suite 500, Denver, Colorado 80202. Upon information and belief, Chipotle Mexican Grill, Inc. operates many restaurants throughout Maryland, one of which is located at 6400F Ridge Road, Suite 1, Sykesville, Maryland 21784.

## **III. FACTS**

6. On or about September 1, 2020, Norwood was an invitee at the Chipotle Mexican Grill located at the property known as 6400F Ridge Road, Suite 1, Sykesville, Maryland 21784 ("Premises"). Immediately after entering the Premises, Norwood slipped on a wet floormat causing him to fall to the ground and sustain profound and painful injuries to his knee, leg, back, and body. Immediately after his fall, Norwood noticed that the floormat had become saturated and was leaking onto to floor surrounding the mat. As a result of the injuries sustained, Norwood was forced to incur substantial medical bills. As of the

date of the filing of this Complaint, Norwood is still experiencing periodic pain and discomfort as result of the injuries he sustained as a result of his fall on September 1, 2020 and may be in need of future medical care.

7. At all times prior to his fall, Norwood maintained a proper and vigilant outlook as he entered the Chipotle and his actions in no way contributed to his fall. To the contrary, Norwood's injuries were solely the result of the unreasonable acts and omissions of Defendant, CMG.

8. Prior to this accident, CMG knew or should have known that (1) liquid had accumulated on the floor of the store where Norwood fell; and (2) no adequate warnings were posted to alert patrons, like Norwood, of the dangerous condition of the liquid on the floor of the Premises. Notwithstanding said knowledge and notice, CMG failed to take reasonable actions to prevent and/or cure the hazardous conditions which it knew or should have known could result in injuries to its customers.

**COUNT I**  
**(Negligence)**

9. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1-8.

10. CMG, at all times material to this Complaint, was in possession, custody and control of the property known as the Chipotle Mexican Grill located at 6400F Ridge Road, Suite 1,

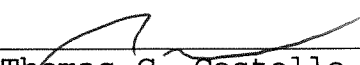
Sykesville, Maryland 21784. As such, CMG owed a duty to Norwood, and all invitees who were lawfully on the premises, to properly maintain the walkways on the Premises free from the dangerous accumulation of liquid which could cause injury. CMG also had a duty to warn Norwood, and all other patrons lawfully entering onto the property, of any defects, dangers or other hazardous conditions which existed on the property.

11. On or about September 1, 2020, CMG breached the duties of care it owed to Norwood by failing to (1) take reasonable actions to ensure that the floors on the Premises were free from the dangerous accumulation of liquid; and (2) warn Norwood, and other patrons lawfully on the Premises, of the aforementioned dangerous conditions of which it knew or should have known existed as of the time of Norwood's fall.

12. As a result of CMG's breaches of the duties of care owed to Norwood, Norwood sustained substantial damages.

WHEREFORE, Plaintiff, Douglas Norwood, prays that the Court enter judgment in his favor and against Defendant, Chipotle Mexican Grill, Inc., for compensatory damages in the amount exceeding \$75,000.00, with the exact amount to be determined at trial, plus pre-judgment interest, costs, and such other and further relief as justice may require.

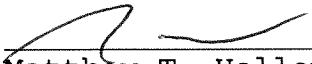
Respectfully submitted,

  
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Thomas C. Costello (Fed. Bar No. 22978)  
Matthew T. Holley (Fed Bar No. 19001)  
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(410) 832-8800

Attorneys for Plaintiff,  
Douglas Norwood

**JURY TRIAL DEMANDED**

Plaintiff hereby demands and request that all claims,  
actions and causes of action set forth herein be tried before a  
jury.

  
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Matthew T. Holley